

**CAUSE NO. 22CVDC-00115**

JONATHAN UBBENGA,

*Plaintiff*

v.

TARLTON STATE UNIVERSITY,

*Defendant*

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IN THE DISTRICT COURT OF

ERATH COUNTY, TEXAS

266<sup>TH</sup> JUDICIAL DISTRICT

**DEFENDANT LONN REISMAN'S  
ORIGINAL ANSWER AND GENERAL DENIAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant, Lonn Reisman (Reisman), by and through the Attorney General of Texas, and respectfully files this its Original Answer and General Denial, and would show the Court as follows:

**I.  
GENERAL DENIAL**

Defendant, Lonn Reisman, asserts a general denial, as authorized by Rule 92 of the Texas Rules of Civil Procedure, to the allegations contained in Plaintiff's Second Amended Petition and demands that Plaintiff be required to prove such allegations by a preponderance of the credible evidence as required by law.

Respectfully submitted,

JOHN SCOTT  
Provisional Attorney General

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

JAMES LLOYD  
Acting Deputy Attorney General for Civil  
Litigation

KIMBERLY GDULA  
Deputy Chief, General Litigation Division

RYAN KERCHER  
Deputy Chief, General Litigation Division

/s/Zachary L. Rhines  
ZACHARY L. RHINES  
Assistant Attorney General  
Texas Bar No.24116957  
Assistant Attorney General  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-9911 | FAX: (512) 320-0667  
[Zachary.Rhines@oag.texas.gov](mailto:Zachary.Rhines@oag.texas.gov)

**COUNSEL FOR DEFENDANTS  
TARLETON STATE UNIVERSITY AND  
LONN REISMAN**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2023, *Defendant Lonn Reisman's Original Answer and General Denial* was filed and served on the following via eFileTexas.gov service and/or as follows:

David Fielding, PC  
101 Summit Ave., Suite 1010  
Fort Worth, Texas 76102  
(817) 529-6070 Telephone  
(817) 529-0037 Facsimile  
[dfielding@fieldingpc.com](mailto:dfielding@fieldingpc.com)

**Via E-FileTexas**

**COUNSEL FOR PLAINTIFF**

/s/ Zachary Rhines  
ZACHARY L. RHINES  
Assistant Attorney General

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Karen Walters on behalf of Zachary Rhines

Bar No. 24116957

karen.walters@oag.texas.gov

Envelope ID: 76964563

Filing Code Description: Answer/Response

Filing Description: DEFENDANT LONN REISMAN'S ORIGINAL ANSWER  
AND GENERAL DENIAL

Status as of 6/26/2023 2:33 PM CST

Associated Case Party: Jonathan Ubbenga

Name	BarNumber	Email	TimestampSubmitted	Status
David Fielding	6974500	dfielding@fieldingpc.com	6/26/2023 2:29:15 PM	SENT

Associated Case Party: Tarleton State University

Name	BarNumber	Email	TimestampSubmitted	Status
Zachary L.Rhines		zachary.rhines@oag.texas.gov	6/26/2023 2:29:15 PM	SENT